

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 3 CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
MICHAEL P. WOODS, M.D. FOR WAVE 3**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion filed against Michael P. Woods for Ethicon Wave 1, Dkt. 2041 (motion), 2043 (memorandum in support). Plaintiffs respectfully request that the Court exclude Michael P. Woods' testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Wave 3 cases identified in Exhibit A attached hereto.

Dated: September 16, 2016

Respectfully submitted,

/s/ D. Renee Baggett

Bryan F. Aylstock, Esq.

Renee Baggett, Esq.

Aylstock, Witkin, Kreis and Overholtz, PLC

17 East Main Street, Suite 200

Pensacola, Florida 32563

(850) 202-1010

(850) 916-7449 (fax)

E-mail: rbaggett@awkolaw.com

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL

Wagstaff & Cartmell LLP

4740 Grand Avenue, Suite 300

Kansas City, MO 64112

816-701-1102

Fax 816-531-2372

tcartmell@wcllp.com

EXHIBIT A

Payne, Elisabeth	2:12-cv-02488
Cooper, Rhonda	2:12-cv-02532
Cosgray, Ila	2:12-cv-02634
Simpson, Brenda	2:12-cv-02716
Farris, Diana N., Estate	2:12-cv-02776
Clones, Susan	2:12-cv-02799
Moosman, Donna	2:12-cv-02805
Kidd, Kathy	2:12-cv-02883
Bartley, Susan	2:12-cv-02921
Smallridge, Audrey	2:12-cv-02956
Taylor, Grethel	2:12-cv-02975
Booher, Stephanie	2:12-cv-03076

CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett
D. RENEE BAGGETT
Aylstock, Witkin, Kreis and Overholtz, PLC
17 E. Main Street, Suite 200
Pensacola, FL 32563
850-202-1010
850-916-7449
Rbaggett@awkolaw.com